

Tab:

Inspection reports/
Compliance monitoring



RCRA COMPLIANCE AND ENFORCEMENT BRANCH
ENFORCEMENT CASE RECOMMENDATION
WORKSHEET¹

EPA ID NUMBER: PAD069880029	FACILITY NAME: CRC Industries
CASE REVIEW OFFICER: Martin Matlin	REVIEW START DATE: 9/11/08
FINDINGS OF INITIAL CASE REVIEW: Facility was inspected on 4/2/08. NOV was sent 8/8/08.	
DISPOSITION RECOMMENDATION: JUD REF APO AO NOV 3013 7003 <u>CLOSE</u> OTHER:	
JUSTIFICATION FOR RECOMMENDATION: Facility responded to NOV with letter dated 9/8/08, adequately addressing all violations and returning to compliance.	
CONCURRENCE SECTION	
CASE REVIEW OFFICER: Martin Matlin/ <i>[Signature]</i>	DATE: 9/11/08
ASSOCIATE DIRECTOR: Carol Amend/ <i>[Signature]</i>	DATE: 9/11/08

¹This is a pre-decisional document protected by the deliberative process and attorney work product privileges (and may also be privileged attorney-client communication). Conclusions or recommendations are intended solely as primary information for government personnel. This worksheet contains tentative conclusions and staff-level recommendations and does not create any rights, or procedural, or defenses, as they are not binding on the Agency or the Department of Justice.

RCRA Compliance Evaluation Inspection

CRC Industries, Inc.

885 Louis Drive
Warminster, PA 18974

RCRA Identification No. PAD069880029

Large Quantity Generator
SIC Code: 2899

Date of Inspection: April 2, 2008

EPA Representatives: Martin Matlin, Environmental Scientist
RCRA Compliance & Enforcement Branch
(215) 814-5789

Roger Reinhart
Ground Water and Enforcement Branch
(215) 814-5462

Brian Poe
Ground Water and Enforcement Branch
(215) 814-5471

Michael Eller
Ground Water and Enforcement Branch
(215) 814-5427

State Representative: Eric Wiediger, Waste Management Specialist
PADEP, Southeast Regional Office
(484) 250-5764

Facility Representatives: Adam Selisker, V.P.
Technology Division
(215) 442-6223

Michelle Rudnick, EH&S Mgr
Technology Division
(215) 442-6224



Martin Matlin
April, 2008

Table of Contents

<u>Section</u>		<u>Page</u>
1.0	Introduction	3
2.0	Facility Background Information	3
2.1	Description of Facility	3
2.2	Permit Status	4
2.3	Process Description	4
3.0	Hazardous Waste Generation	4
4.0	Hazardous Waste Storage	5
5.0	Inspection Observations	5
5.1	Primary HW Storage Area	5
5.2	Tank Farm	5
5.3	Mixing Room 2 & 3	6
5.4	Main Mixing Room	6
5.5	Aerosol Filling/Main Production Room	7
5.6	Block Seal Room	7
5.7	Copper Coat Room	7
5.8	Maintenance Shop	7
5.9	Hot Room	8
5.10	Aerosol Line #2	8
5.11	Laboratory	8
6.0	Records Review	8
6.1	Manifests and LDR Forms	8
6.2	Inspection Records	9
6.3	Waste Analyses	9
6.4	Contingency Plan	9
6.5	Training	9
6.6	Biennial Reports	10
7.0	Attachments	10

1.0 Introduction

On April 2, 2008, the United States Environmental Protection Agency, Region III ("EPA"), conducted an unannounced Compliance Evaluation Inspection (CEI) of CRC Industries, Inc. ("CRC" or "the facility") jointly under the Resource Conservation and Recovery Act (RCRA) and the Clean Water Act (CWA). EPA representatives Martin Matlin of the RCRA Compliance & Enforcement Branch; and Roger Reinhart, Brian Poe and Michael Eller of the Ground Water & Enforcement Branch were accompanied by Eric Wiediger of the PADEP. The facility was represented by Adam Selisker, V.P. Technology Division and Michelle Rudnick, EH&S Mgr Technology Division.

The inspection team arrived at the facility at 9:45 am, presented credentials to Mr. Selisker and was escorted to his office. Mr. Matlin and Mr. Reinhart explained the purposes of the joint RCRA Subtitle C and CWA Underground Injection Control inspections to be conducted at CRC.

The inspection included an evaluation of the facility's processes and its compliance with RCRA and the UIC program and the federally authorized Pennsylvania Rules and Regulations. **This report deals only with the RCRA program evaluation.** All information included in this report is the result of statements by the facility representatives, materials shown to the inspectors by the facility representatives and/or documents provided by the facility representatives to the inspectors at the time of the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in this report.

2.0 Facility Background Information

2.1 Description of Facility

CRC is located on Louis Drive in Warminster, Pennsylvania. It is a specialty chemical formulator, primarily by filling aerosol cans with various mixtures to be used in the auto, marine, and general maintenance fields.

The facility was established in 1974 and is owned by Berwind in Philadelphia. It employs around 160 people and runs one 8-hour shift each weekday and a 10-hour night shift Monday through Thursday. The facility is located on an eight- to ten-acre plot and owns a similarly-sized wooded tract alongside the working property. The facility used to operate underground storage tanks onsite, but all USTs were removed around 1988. There was a methanol spill in 1994 due to a broken valve on an aboveground tank and the facility worked with the state to clean it up. CRC has nine monitoring wells in various parts of the facility to track general solvent groundwater contamination in the area. Four of the facility's wells have found detectable levels of PCE and TCE.

2.2 Permit Status

CRC is a Large Quantity Generator and does not currently hold a RCRA permit. It discharges only sanitary wastewater to the Warminster Municipal Authority, and has a Title 5 Air permit which covers the main manufacturing area.

2.3 Process Description

Product ingredients are brought in primarily by tanker truck, but also by rail and individual drums. Materials brought in by rail or tanker truck are stored in a series of above-ground storage tanks (ASTs) by the New Hope/Ivyland railroad that runs along the southeast edge of the facility. PCE is the primary ingredient, although TCE, toluene, acetone, methanol, xylene, isohexane and various other materials are also used. Ingredients are mixed in tanks in one of two Mixing Rooms then pumped to Packaging, where most products are placed into aerosol cans by automated machinery, boxed and shipped about a mile away to the company's main warehouse.

3.0 Hazardous Waste Generation

The following waste streams are classified as hazardous or non-hazardous according to the facility's generator knowledge:

- **Chlorinated solvents and flammable liquids:** these result from flushing the mixing tanks and lines. Satellite drums accumulate the waste in the Mixing Rooms before being moved to the main HW storage area.
- **Used rags and spill materials:** may be hazardous due to contact with listed waste or flammables – stored in satellite containers before transfer to 55gal drums in the main HW storage area.
- **Lab cleanups:** one lab is present for testing and development and occasionally generates HW disposed of in lab packs.
- **Used lamps and batteries:** both of these are collected and managed as Universal Waste. Mr. Selisker stated that batteries are collected in a bucket in the office area and was unsure where used lamps are collected.
- **Aerosol cans:** used or defective cans are punctured and drained and either reused or sold as scrap. The material drained is either reused or disposed of as HW or non-HW depending on the constituents.

4.0 Hazardous Waste Storage

The facility maintains one less-than-90-day storage area and several satellite accumulation areas. It was determined during the tour that some of the satellite areas would more properly be classified as additional <90-day storage areas.

5.0 Inspection Observations

A tour of the facility began at 10:25 am and resulted in the following observations:

5.1 Primary HW Storage Area

The facility's primary Hazardous Waste storage area is located in the "Back" or "New" Warehouse. Approximately 75 x 55gal steel drums were present at the time of the inspection, sitting on wooden pallets in a four-tiered metal shelf system (please see Attachment 1, Photographic Log, Photos 1 & 2). Besides those on the bottom tier, most of the drums' labels were unreadable due to their height and/or position. One drum on the bottom tier did not appear to be dated (Photos 3 & 4). Out of the few drums on the bottom tier where the dates could be read, the oldest date noted was 3/12/08. Generally the drums appeared to be in good condition; however, one drum on the third tier had a dent approximately ten inches wide (Photo 5) and at least three blue drums on the left hand side of the shelves appeared to have a slight amount of liquid drippage on the side of the drum (Photos 6 & 7; drums on tiers two, three, and four).

Upon returning to this area at a later point in the tour, it was determined that at least six other 55gal drums of hazardous waste were present, on wooden pallets across from the metal shelving unit. All drums appeared to be closed, properly labeled and in good condition.

Near these drums the facility was also storing about sixty more 55gal drums, stacked three-high on wooden pallets (Photo 11). According to Mr. Selisker these drums contained purge water removed from the monitoring wells. Most were dated 1/17/08 and labeled "MW" with a number representing which well the water was removed from. Apparently these drums were awaiting analysis.

Several cubic yard totes labeled as containing non-hazardous wastewater were also found in this Warehouse.

5.2 Tank Farm

Several ASTs are present in this open area near the New Hope/Ivyland railroad tracks. According to Mr. Selisker, all ASTs are used to store product ingredients, not waste.

Near the tank farm the facility's can-crushing machine was found with a small dumpster placed underneath, beside several 55gal drums (Photo 8). The facility crushes defective or

unusable cans, and stores the metal in drums as scrap. The “flush” drained from the cans is stored in drums until it can be reused in the process line. If it can’t be reused, it is disposed of (as hazardous or non-hazardous waste depending on the constituents).

Also outside, next to the Boiler Room, was a large plastic tote on a concrete pad, about two thirds full, labeled as non-hazardous “Water Waste” (Photo 9). Mr. Selisker stated that this most likely came from either the facility’s hot water bath (for testing the integrity of filled cans) or as waste from one of the water-based products CRC manufactures.

5.3 Mixing Room 2 & 3

This room contains nine mixing tanks with flexible, removable hoses connected between the bottoms of the tanks and a series of pumps anchored to the floor used for moving the product or flushing waste to drums. No photographs were allowed in either mixing room due to flammability issues, according to Mr. Selisker. He stated that the facility determines after each flushing whether or not the material removed from the tank may be reused or not. According to him, 90% of the time the material is reusable as opposed to becoming a waste. Next to the tanks in use, open pans or buckets were found beneath the hose connections. In the pan next to tank T11, a few ounces of liquid was found. Next to tank T13 an open 5gal bucket held about four inches of liquid. Mr. Selisker was not sure if this material was reusable “flush” or waste. Next to tank T20 another open pan was found containing blue liquid. The pans/buckets were not labeled.

Next to tank T17 a 55gal satellite drum was found with an open bung and open funnel. It was labeled as hazardous waste “TCE, PCE” with waste codes F002, F003, F005, D001, D010, D039 and D040 and felt at least one third full. Mr. Selisker later stated that this drum was in the process of being filled with unusable flushing waste at the time of the inspection.

Also in this room some used spill material was found in an open, unlabeled, blue plastic container (approximately 50gal capacity). The spill material had an oily smell, and Mr. Selisker did not know its specific origin, but stated that operators are trained not to place hazardous waste in the trash containers.

5.4 Main Mixing Room

Twelve tanks are present in this room, with a similar set-up of flexible hoses and floor-anchored pumps as in the above “2 &3” Mixing Room. An open pan of liquid waste was found near tank T4 and exhibited a solvent smell. Another open pan with a semisolid material was found beneath tank T25.

Another 55gal satellite drum was found here with an open funnel and bung (Photo 10). As we watched, an operator poured waste from a 5gal bucket into the drum, then closed the bung and funnel and went to close the bung and funnel on the drum in Mixing Room “2 &3.”

Two open, blue plastic containers (approximately 50gal capacity each) were also present in this room, containing used spill materials. They were not labeled.

5.5 Aerosol Filling/Main Production Room

Near Aerosol Line #1 a closed, 21gal metal can of spill material/used rags was found near the conveyor belt. It was labeled as hazardous waste, "flammable solid," and "oily waste."

Several open 5gal buckets were found underneath the corners of the filling machines, used to catch any drippage which might occur during filling.

A wooden pallet in the middle of the room contained four 55gal drums. Although Mr. Selisker initially described this as a satellite area, all of the drums were dated 3/27/08 and labeled as hazardous waste with applicable F- and D-list codes. Additionally, Mr. Selisker stated that these drums were included in the facility's weekly inspections. Mr. Matlin stated that this would more properly be considered another <90 day storage area, as it appeared to be in compliance with those requirements and not the satellite area requirements. No photographs were permitted due to flammability concerns.

A small open dumpster was also found here, containing plastic and used spill materials. Mr. Selisker stated that this container was for trash only (non-hazardous residual waste).

5.6 Block Seal Room

In this room non-hazardous wastewater is generated from production of the facility's Block Seal product. One cubic yard plastic tote, about one fifth full, was found here and labeled as non-hazardous.

5.7 Copper Coat Room

Sixteen 55gal drums were found in this room, containing water purged from the facility's monitoring wells. Mr. Selisker stated that the drums were being held for analysis. All of the drums were dated, with the oldest date being 1/21/08. No photographs were permitted due to flammability concerns.

Sixteen 125gal totes were also present. Mr. Selisker was unsure whether these totes contained flush from the Block Seal production line or more water from the monitoring well purges.

5.8 Maintenance Shop

One 21gal metal container of used rags was found here, closed and labeled as hazardous waste. An open five gallon bucket of dirty liquid was nearby – Mr. Selisker was unsure of its

contents.

Just outside the Maintenance Shop six containers of used lamps were found (Photos 12 & 13). Four of the containers were open and all were unlabeled. Several of the bulb models were recorded. A separate, closed container of used lamps was found nearby with a Universal Waste label.

At the end of the inspection, this area was revisited and all containers had been closed and adequately labeled.

5.9 Hot Room

This room contained several 55gal drums of raw materials – mostly heavy oils and waxes – and is maintained at a high temperature to keep these ingredients fluid.

5.10 Aerosol Line #2

This room is set up similarly to Aerosol Line #1 – open 5gal buckets were present underneath the corners of the filling machines, and four 55gal drums were found on a pallet in the center. All four 55gal drums were closed and full, labeled as hazardous waste “TCE, PCE” and dated 2/28/08. Two open, blue plastic containers about half-full with used spill materials were found here, one labeled “Trash Line 2 Gasser” and one “Trash Line 2 Water Bath.” Photographs were not permitted.

Outside this building, next to the facility’s spill gate, several 55gal drums were found on wooden pallets (Photo 14). According to Mr. Sleisker, these contained “cuttings” from soil borings conducted during the groundwater investigation and were awaiting analysis. All were closed and dated either 1/24/08 or 1/28/08.

5.11 Laboratory

This lab is used to develop new products and conduct quality assurance on existing lines. One 21gal can was found here, containing used rags. It was closed, and labeled as containing hazardous waste and flammable solids.

6.0 Records Review

6.1 Manifests and LDR Forms

Manifests and LDR forms for 2008 through 2005 were reviewed and the following concern was noted:

- Manifest number 002226232 for a shipment dated 3/28/07 did not have an associated

LDR form and contained several types of waste codes not found in the facility's typical hazardous waste shipments (Attachment 2).

Bills of lading were found in the file showing that the facility has been shipping waste lamps and ballasts for recycling purposes on an approximately yearly basis.

6.2 Inspection Records

Weekly inspection logs were found for the following areas: "Mixing Rooms," "Fill Line 1," "Fill Line 2," "Repack," and "Storage Rack." These inspections included checks evaluating whether containers were properly labeled, closed, in good condition, and on containment; and the number of containers present. The second week of March 2008 did not appear to have been logged and included the notation "on vacation" (Attachment 3) No other concerns were noted.

6.3 Waste Analyses

The facility representatives stated that no waste analyses had been conducted to this point, with the exception of a waste profile conducted on the hazardous line flushing (Attachment 4). Generator knowledge alone has been used to determine which waste streams are hazardous or non-hazardous.

6.4 Contingency Plan

The facility maintains an "Emergency Response Plan" which is intended to cover requirements for the SPCC, RCRA, and Storm water programs, and was last revised 11/20/03. Ms. Rudnick is listed as the primary Emergency Coordinator, with Mr. Selisker the "First Alternate." The plan appeared generally to cover the RCRA requirements, although the list of emergency equipment (with locations and capabilities) was very minimal and did not seem to reflect current conditions at the facility (cover and page 18 excerpt in Attachment 5). Also, although a letter was found showing that a copy of the plan was submitted to PADEP in 2004, no evidence was found that the plan had been shared with other local authorities.

6.5 Training

The facility representatives stated that all production, laboratory and technical department personnel are required to take yearly RCRA training. Ms. Rudnick maintains detailed, RCRA-specific training materials and conducts testing of personnel during the yearly training sessions. Sign-in sheets and test results were found for the years 2007 through 2003, with Ms. Rudnick listed as the trainer (sign-in sheets for 2007 in Attachment 6). Certificates of offsite HAZWOPER and "Public Safety" training for Ms. Rudnick were found for at least the years 2008 through 2005.

The facility also maintains a list of personnel requiring training, broken down by division

(e.g., Technology, Purchasing, Lab, etc.), although more specific position descriptions were not found (Attachment 7).

No training records were found for Mr. Selisker, although it was noted that he is the Fire Chief for a neighboring town and teaches Emergency Response training for several public entities.

6.6 Biennial Reports

Biennial reports for the years 2005 and 2007 were on file as having been submitted to the State in 2006 and 2008, respectively. The reports were reviewed and no concerns were noted.

7.0 Attachments

1. Photographic log
2. Manifest #002226232
3. "Waste Storage Inspection Report" for March 2008
4. Waste profile for "Line Flushings" waste solvent
5. Cover and page 18 of "Emergency Response Plan"
6. Sign-in sheets for June 2007 RCRA training
7. Personnel list

Attachment #1

Photographic Log
CRC Industries, Inc. PAD069880029
Inspection Date 4/2/08



Photograph 1: Main hazardous waste storage area in "Back" or "New" Warehouse



Photo 2: Another overall shot of HW storage area

Inspection Date 4/2/08

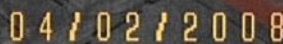


Photo 3: One 55gal HW drum (blue and white drum in center) not dated



Photo 4: Close-up of label from Photo 3 drum

Photographic Log
CRC Industries, Inc. PAD069880029
Inspection Date 4/2/08



Photo 5: 55gal HW drum on 3rd tier w/dent (blue drum top center)



Photo 6: 55gal HW drum on 2nd tier with liquid dripping from lid

Photographic Log
CRC Industries, Inc. PAD069880029
Inspection Date 4/2/08



Photo 7: overall shot of left side (all 3 blue drums showed liquid drips -- Photo 6 shows bottom left drum here)



Photo 8: Aerosol can crushing system and associated drums holding scrap and "flush"

Photographic Log
CRC Industries, Inc. PAD069880029
Inspection Date 4/2/08



Photo 9: Tote of water-based "non-hazardous" waste

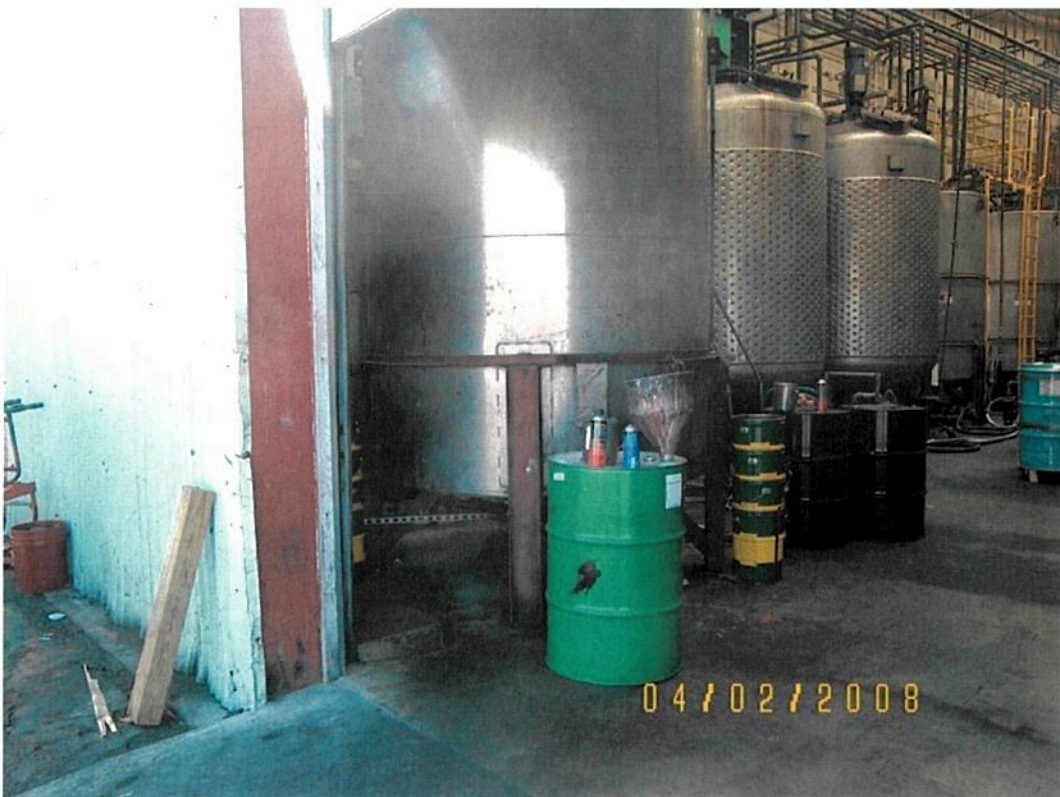


Photo 10: 55gal HW drum w/open funnel in Main Mixing Room

Photographic Log
CRC Industries, Inc. PAD069880029
Inspection Date 4/2/08



Photo 11: 55gal drums containing purge water from monitoring wells



Photo 12: Six containers of used lamps outside Maintenance Shop, several open; all unlabeled

Photographic Log
CRC Industries, Inc. PAD069880029
Inspection Date 4/2/08

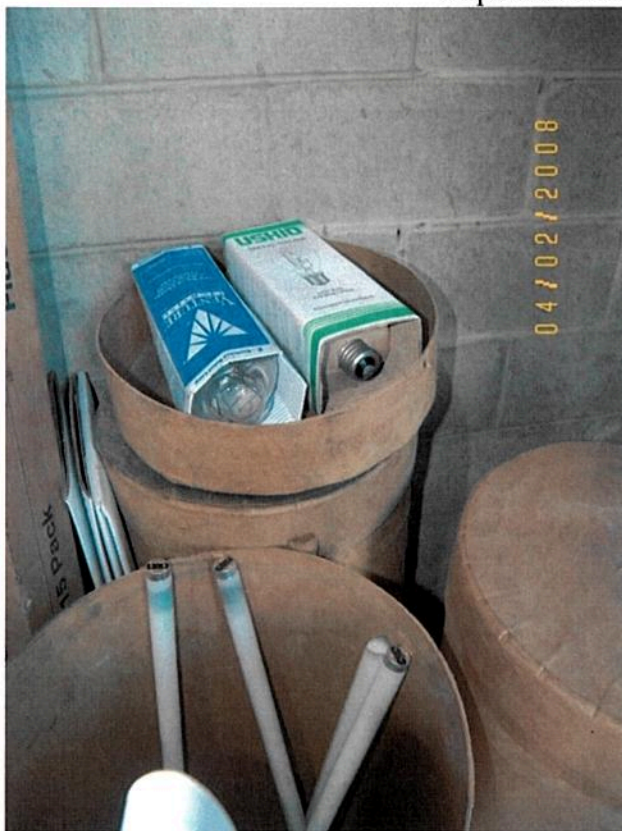


Photo 13: Close-up of open lamp containers



Photo 14: Several 55gal drums of "cuttings" from soil bores "awaiting analysis" – most dated 1/24 or 1/28

Attachment #2

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PAD069880029	2. Page 1 of 2	3. Emergency Response Phone (215) 674-4300	4. Manifest Tracking Number 002226232 JJK		
5. Generator's Name and Mailing Address CRC Industries, Inc. 885 Louis Drive, Warminster, PA 18974 Generator's Phone: (215) 674-4300			Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name Eldredge, Inc.			U.S. EPA ID Number PAD014146179				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address Ecoflo, Inc. 2750 Patterson Street, Greensboro, NC 27407 Facility's Phone: (336) 855-7925			U.S. EPA ID Number NC D 980842132				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. Waste Aerosols, 2.1, UN1950	002	DF	60	P	D001
	X	2. RQ Waste Aerosols, 2.1, UN1950	001	DM	200	P	D001
	X	3. RQ Waste Flammable Liquid, N.O.S., 3, UN1993, PGII (Paints, Alcohol)	001	DF	150	P	D001
	X	4. Waste Corrosive Liquid, Basic, Inorganic, N.O.S., 8, UN3266, PGII (Sodium Hydroxide, Ammonia)	001	DF	38	P	D002
14. Special Handling Instructions and Additional Information <div style="text-align: right;">431 BP 132416</div>							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offendor's Printed/Typed Name Pete Whiting			Signature <i>Pete Whiting</i>		Month Day Year 03 18 07		
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials						
TRANSPORTER	Trans Unresponsive Based on Revised Scope					Month Day Year 03 28 07	
	Transporter 2 Printed/Typed Name _____ Signature _____					Month Day Year ____	
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number: _____						
	18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____						
	Facility's Phone: _____						
18c. Signature of Alternate Facility (or Generator) _____ Month Day Year ____							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
4141		2. H 171		3. H 141		4. H 141	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Unresponsive Based on Revised Scope					Month Day Year 04 03 07		

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PAD069880029		2. Page 1 of 1	3. Emergency Response Phone 1-800-453-1760		4. Manifest Tracking Number 000679033 SKS		
		5. Generator's Name and Mailing Address CRC INDUSTRIES INC 885 LOUIS DRIVE WARMINSTER Generator's Phone: 215-674-5960							Generator's Site Address (if different than mailing address) ATTN MICHELLE RUDNI PA 18974 2820
Generator's Name and Mailing Address		6. Transporter 1 Company Name SJ Transportation		U.S. EPA ID Number NJDO 71629976		Generator's Name and Mailing Address		U.S. EPA ID Number NJDO 71629976	
		7. Transporter 2 Company Name		U.S. EPA ID Number					
Designated Facility Name and Site Address		8. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 1200 SYLVAN STREET LINDEN, Facility's Phone: 908-862-2000		U.S. EPA ID Number 000635 NJ 07036		Designated Facility Name and Site Address		U.S. EPA ID Number NJD002182897	
		9. Hazardous Waste Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type				11. Total Quantity	
Generator's Name and Mailing Address		1. RO, WASTE FLAMMABLE LIQUIDS, TOXIC, N.O.S. (TRICHLOROETHYLENE, PERCHLOROETHYLENE) 3(6.1) UN1992 PGII (D039, D040)		96 DM		49,800 lbs		P	
		2. RO, WASTE SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S. (CONTAINS XYLENE, TOLUENE) 4.1 UN3175 PG II (D001)		4 DM		800 lbs		P	
		3.							
		4.							
Generator's Name and Mailing Address		14. Special Handling Instructions and Additional Information 1)ERG#131; 2)ERG#133		SK TRCK#109087316		0000607902			
		15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's Name and Mailing Address		Generator's/Offor's Printed/Typed Name Lauren Colburn		Signature <i>Lauren Colburn</i>		Month Day Year 03 12 08			
		16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: _____ Date leaving U.S.: _____					
Transporter Acknowledgment of Receipt of Materials		17. Transporter Acknowledgment of Receipt of Materials Trans: Unresponsive Based on Revised Scope		Month Day Year 3 12 08					
		Transporter 2 Printed/typed Name _____ Signature _____		Month Day Year ____					
Discrepancy		18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection		Manifest Reference Number: _____					
		18b. Alternate Facility (or Generator) Facility's Phone: _____		U.S. EPA ID Number _____					
Signature of Alternate Facility (or Generator)		18c. Signature of Alternate Facility (or Generator)		Month Day Year ____					
		19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H061 2. H141 3. _____ 4. _____							
Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a		20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Unresponsive Based on Revised Scope		Month Day Year 13 11 08					

U. Manifest Tracking Number
00 2226232 JTK

Generators Name CRC Industries, Inc.
885 Louis Drive, Warminster, PA 18974
 Transporter _____ Company Name _____

25. Transporter _____ Company Name _____

U.S. EPA ID Number

26. Transporter _____ Company Name

U.S. EPA ID Number

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))
------------	---

28. Containers

29. Total
Quantity

30. Unit
Wt/Vol

31. Waste Codes

X Waste Corrosive Liquid, Acidic, Inorganic,
N.O.S., 8, UN3264, PGII (Phosphoric Acid, Hydrochloric Acid)

No.

Type

30/P

DOOF

2. Special Handling Instructions and Additional Information

Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name

Signature _____

Transporter _____ Acknowledgment of Receipt of Materials
 Initialed/Typed Name

Month Day Year

Signature _____

Month Day Year

Discrepancy

Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems):

Unresponsive Based on Revised Scope

DESIGNATED FACILITY TO GENERATOR

Attachment #3

Waste Storage Inspection Report

March-08

Week 1 Week 2 Week 3 Week 4 Week 5
 Date: 3/3/08 3/10/08 3/17/08 3/24/08 3/31/08

Hazardous Waste Storage Areas:

1) Mixing Rooms	033	3/12/08	566	566	566
Number of waste drums - Room 1	1		1	1	1
Room 2	1		1	1	1
Are drums labeled properly?	yes		yes	yes	yes
Are drums painted?	↓		↓	↓	↓
Are drums closed?	↓		↓	↓	↓
Are drums in good condition?	↓		↓	↓	↓
2) Fill line 1					
Are drums labeled properly?	yes		yes	yes	yes
Are drums dated?	↓		↓	↓	↓
Are drums painted?	↓		↓	↓	↓
Are drums closed?	↓		↓	↓	↓
Are drums in good condition?	↓		↓	↓	↓
Are drums on containment?	↓		↓	↓	↓
3) Fill line 2					
Are drums labeled properly?	yes		yes	yes	yes
Are drums dated?	↓		↓	↓	↓
Are drums painted?	↓		↓	↓	↓
Are drums closed?	↓		↓	↓	↓
Are drums in good condition?	↓		↓	↓	↓
Are drums on containment?	↓		↓	↓	↓
4) Repack					
Number of waste drums	1		1	1	1
Drum labeled properly?	yes		yes	yes	yes
Drum closed?	↓		↓	↓	↓
Drum in good condition?	↓		↓	↓	↓
5) Storage Rack					
Number of drums in rack	96		40	64	108
Are drums labeled properly?	yes		yes	yes	yes
Are drums dated?	↓		↓	↓	↓
Are drums painted?	↓		↓	↓	↓
Are drums closed?	↓		↓	↓	↓
Are drums in good condition?	↓		↓	↓	↓

Non-hazardous Waste Storage Areas

Number of totes	32		31	31	31
Are all totes labeled?	NO		NO	NO	NO
Are all totes in good condition?	NO		NO	NO	NO
Any leaks observed?	NO		NO	NO	NO
Inspector's Initials:	Pite		Pite	Pite	Pite

Comments:

Attachment #4

8XXXX-RXXXX PREQUALIFICATION EVALUATION PAGE 1 OF 4
ENVIROSYSTEMS COMPLETED: 05/28/04
ENVIROSYSTEMS - FUELS REVISED:
RUN: 06/01/04

CONTROL #: 2226902-2
BRANCH/SUBMITTER: 000003 LAB #: 2226902-2
ENVIROSYSTEMS PROFILE REF #: 3571457-0001

GENERATOR INFORMATION: CUSTOMER NUMBER: 0000-60-7902

**CRC CHEMICALS
885 LOUIS DRIVE
ATTN ADAM SELISKER
WARMINSTER PA 18974-2820**

BRANCH: 000003 - ENVIROSYSTEMS

A. GENERATOR INFORMATION:

GENERATOR NAME & FACILITY ADDRESS: BILLING COMPANY & ADDRESS:
CRC CHEMICALS
885 LOUIS DRIVE
ATTN ADAM SELISKER
WARMINSTER PA 18974-2820
PHONE: 215-674-5960
S.I.C.: 2992
STATUS: US EPA ID: PAD069880029 STATE ID:

B. SHIPPING INFORMATION: HAZ CLASS/DIVISION: ID#
(UN/NA): UN1992 PACK GRP: II

NON-BULK SHIPPING CONTAINERS
55 STEEL QTY: 1000 FREQ: YEARLY

C. GENERAL MATERIAL & REGULATORY INFORMATION:

NAME OF MATERIAL: WASTE SOLVENT
PROCESS DESCRIPTION: LINE FLUSHINGS
YES NO
X REGULATED OR LICENSED RADIOACTIVE WASTE
X REGULATED MEDICAL / INFECTIOUS WASTE
X WASTE SUBJECT TO BENZENE NESHAP REGULATIONS
X TSCA REGULATED PCB WASTE
X REGULATED OZONE DEPLETING SUBSTANCE
X CERCLA REGULATED (SUPERFUND) WASTE
X WASTE CONTAINS UHC'S/CONSTITUENTS OF CONCERN
X UHC IN SECTION D
X EXEMPT WASTE; IF YES, LIST REFERENCE 40 CFR
X STATE HAZARDOUS WASTE
X ARTESIA MS: DIOXIN-LISTED WASTE W/F020-F023 OR F02
X EPA HAZARDOUS WASTE
EPA WASTE CODES: F002 F003 F005 D001 D039 D040
ORIGIN CD: 0 SOURCE CD: FORM CD: SYSTEM CD:

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

8XXXX-RXXXX
ENVIROSYSTEMS
ENVIROSYSTEMS - FUELS

PREQUALIFICATION EVALUATION
COMPLETED: 05/28/04
REVISED:
RUN: 06/01/04

PAGE 2 OF 5

BRANCH/SUBMITTER: 000003
PROFILE REF #: 3571457-0001

LAB #: 2226902-2 ENVIROSYSTEMS

D. MATERIAL COMPOSITION: ANALYTICAL

RMP COMPOUND DENOTED WITH #

1. CHEMICAL/PHYSICAL CONSTITUENTS:

PERCHLOROETHYLENE	14.60	WT%
MEDIUM-BOILING HYDROCARBONS (C9-C13)	9.50	WT%
HIGH-BOILING HYDROCARBONS (C14-C20)	9.10	WT%
TOLUENE	7.90	WT%
LOW-BOILING HYDROCARBONS (C5-C8)	7.60	WT%
ETHYLENE GLYCOL BUTYL ETHER	3.60	WT%
ACETONE	3.00	WT%
XYLENES (ORTHO-, META-, AND PARA-)	2.70	WT%
ETHYLBENZENE	.60	WT%
TOTAL OTHERS (<1.0% EACH)	.20	WT%

RESIDUE	38.50	WT%
---------	-------	-----

RESIDUE DESCRIPTION: OIL

WATER CONTENT	2.70	WT%
---------------	------	-----

2. ELEMENTAL CONSTITUENTS:

THE FOLLOWING VALUES ASSOCIATED WITH THE "<" ARE NON-DETECTED. THE VALUE LISTED IS THE REPORTING LIMIT.

ALUMINUM	16.00	MG/KG
ANTIMONY	< 6.00	MG/KG
ARSENIC (D004)	< 7.00	MG/KG
BARIUM (D005)	7.60	MG/KG
BERYLLIUM	< 1.00	MG/KG
CADMIUM (D006)	< 1.00	MG/KG
CALCIUM	230.00	MG/KG
CHROMIUM (D007)	4.10	MG/KG
COBALT	< 2.00	MG/KG
COPPER	4.50	MG/KG
IRON	17.00	MG/KG
LEAD (D008)	< 6.00	MG/KG
MAGNESIUM	15.00	MG/KG
MANGANESE	< 1.00	MG/KG
MERCURY (D009)	< 3.00	MG/KG
MOLYBDENUM	< 2.00	MG/KG
NICKEL	< 2.00	MG/KG
PHOSPHORUS	22.00	MG/KG
POTASSIUM	270.00	MG/KG
SELENIUM (D010)	< 13.00	MG/KG
SILVER (D011)	< 1.00	MG/KG
SODIUM	530.00	MG/KG
THALLIUM	< 35.00	MG/KG
TIN	5.70	MG/KG
TITANIUM	< 10.00	MG/KG
TOTAL BROMINE	.20	WT%
TOTAL CHLORINE	8.10	WT%
TOTAL FLUORINE	< .10	WT%
TOTAL SULFUR	< .10	WT%

8XXXX-RXXXX PREQUALIFICATION EVALUATION PAGE 3 OF 5
ENVIROSYSTEMS COMPLETED: 05/28/04
ENVIROSYSTEMS - FUELS REVISED:
RUN: 06/01/04
CONTROL #: 2226902-2
BRANCH/SUBMITTER: 000003 LAB #: 2226902-2
ENVIROSYSTEMS PROFILE REF #: 3571457-0001

VANADIUM < 2.00 MG/KG
ZINC 40.00 MG/KG

E. REACTIVE CHARACTERISTICS: WASTE EXHIBITS NO REACTIVE CHARACTERISTICS

YES NO

X EXPLOSIVE
X SHOCK SENSITIVE
X WATER REACTIVE
X AIR REACTIVE
X REACTIVE CYANIDE .00
X REACTIVE SULFIDE .00
X POLYMERIZABLE

F. MATERIAL PHYSICAL CHARACTERISTICS @ 70F:

OF PHASES 1.0
LIQUID % 100.0
COLOR BROWN
SPECIFIC GRAVITY 0.94
VISCOSITY <50
FLASH AT 73.0 F
ASH % < 0.1 WT%
PH NON-AQUEOUS
PH 9.5
BTU'S / LB. OR RANGE 14100.0 BTU/LB

SK SALES REP NAME: JOE SCHRIER

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

8XXXX-RXXXX PREQUALIFICATION EVALUATION PAGE 4 OF 5

ENVIROSYSTEMS

COMPLETED: 05/28/04

ENVIROSYSTEMS - FUELS

REVISED:

RUN: 06/01/04

CONTROL #: 2226902-2

BRANCH/SUBMITTER: 000003

LAB #: 2226902-2

ENVIROSYSTEMS

PROFILE REF #: 3571457-0001

CORPORATE REVIEW:

DISPOSITION: ACCEPT FOR SHIP SALES PART: 0890500 ORGANIC LIQ H/BTU L/

TECHNOLOGY DISPOSITION CODE: FBLQ LIQUIDS FOR FUEL BLENDING

REVIEW DATE: 05/28/2004

REVIEWERS: CAS

APPROVED DOT - SHIPPING DESCRIPTION

0171285 DRUM

RQ,WASTE FLAMMABLE LIQUIDS,TOXIC, N.O.S.

(TRICHLOROETHYLENE, PERCHLOROETHYLENE)

3 UN1992 PG II (D039,D040) (ERG#131)

US EPA WASTE CODES: F002 F003 F005 D001 D039 D040

USA

REVIEW COMMENTS:

*

* OK FOR PUMPABLE FUEL. WASTE SHIPPED IN DRUMS FROM THE CUSTOMERS SITE NEED

Attachment #5

EMERGENCY RESPONSE PLAN

PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN

SPILL PREVENTION AND RESPONSE PLAN

HAZARDOUS WASTE CONTINGENCY PLAN

SPILL PREVENTION, CONTROL AND COUNTERMEASURE

Prepared For:

CRC Industries, Inc.

Warminster, PA

Prepared By:



550 Pinetown Road, Suite 166
Fort Washington, PA 19034
215-643-5466 ♦ 215-643-2772

November 20, 2003

D.5 Emergency and Personal Protective Equipment Available for Response

CRC has the equipment listed on Table 1 for use in an emergency.

Table 1. Emergency Equipment

Equipment	Location	Use
Absorbent Materials	<ul style="list-style-type: none">• Near sodium silicate tanks• Outside of tank farm	Spill Response
Forklifts	Throughout facility	Spill Response
First Aid	Lab; 2 nd floor; Front of plant next to office door	Medical
Fire Extinguishers	Throughout facility	Extinguish Fires

A Spill Cart is available to aid in the clean up of an accidental release. The Spill Cart contains sufficient quantities of the following Personal Protective Equipment (PPE) and emergency items: dust masks, absorbent materials, non-sparking shovels, white spill pads (oil), grounding cables, an acid kit, sodium bicarbonate, magnetic drum plug, overboots, safety glasses, saranex suits, green spill pads (acids/corrosives), caution tape, non-sparking bung wrench, nitrile glove, emergency response books, nitrile coated cotton gloves, gray spill pads (general use), rubber dike, and a wooden plug kit. NIOSH-certified respirators are stored in the respirator storage cabinet when not in use.

The mixing supervisor designates an employee to inspect the contents of the spill cart on a monthly basis. Inspections are recorded and missing or depleted items are replaced. Maintenance of equipment is conducted per the manufacturer's instructions. Most of the PPE in the spill cart is single use, except for the respirators which are maintained according to the Respirator Protection Plan.

D.6 Decontamination

Emergency Response Team employees are responsible for decontamination and other follow-up activities after an emergency response. All equipment that comes in contact with hazardous materials should be decontaminated or disposed. Reusable pieces of equipment such as shovels and containment berms will be rinsed and the rinse materials are collected in a drum for proper disposal. Most of the personal protective equipment, such as gloves and protective suits, are for single use and should be collected in a separate drum for disposal following use. Non-disposable personal protective equipment, such as respirators and boots, are assigned to specific employees. These employees are responsible for decontaminating their PPE following each use.

Attachment #6

DATE: June 21, 2007

[illegible]

CRC INDUSTRIES INC. SIGN-IN SHEET

COURSE TITLE: Hazardous Waste / Stormwater Refresher Training

INSTRUCTOR(S): Michelle Rudnick

DATE: June 7, 2007

PRINT NAME	SIGNATURE	DEPARTMENT
Tom Golebiewski	Tom Golebiewski	PROD.
Douglas Smith	Douglas Smith	PROD.
MIKE HANNAN	Michael Hannan	MIXING
JOE FAUST	Joe Faust	MIXING
DALE TAYLOR	Dale Taylor	MIXING
KEN HAHN JR.	Kenneth L. Hahn	PROD.
Bill Windisch	Bill Windisch	PROD.
EDWARD MILLS	Edward Mills	PROD.
Rosemarie Walters	Rosemarie Walters	PROD.
TIM ARWOOD	Tim Arwood	PROD.
MICHAEL FLASH	Michael Flash	MIXING
IMPOLENEK NEM C.F.	M. Nemec	R&D
WILDA ERNST	Wilda Ernst	Technology
SUZANNE ZEFFER	Suzanne Zeff	"
David Williams	David Williams	"
DOUGLAS ARCH	Douglas Arch	PRODUCTION
Donald K. MacMillan	Donald K. MacMillan	Production
Steve Forbes	Steve Forbes	Production
Maryann Jandaly	Maryann Jandaly	Technology

CRC INDUSTRIES INC. SIGN-IN SHEET

COURSE TITLE: Hazardous Waste / Stormwater Refresher Training

INSTRUCTOR(S): Michelle Rudnick

DATE: June 7, 2007

PRINT NAME	SIGNATURE	DEPARTMENT
DARREN POWELL	Dan Pow	Production
FRED SIGNORINO	Fred Signorino	LAB
ANDY DROBEK	Andy Drobek	LAB
JOE GARISH	Joe Garish	Mixing
ED FARLEY	Ed Farley	Mixing
WES BOWEN	Wes Bowen	PRODUCTION
HENRY LUALHATI	Henry Lualhati	PRODUCTION
EDNA POMEROY	Edna Pomerooy	PRODUCTION
Uy. SAVONG	Uy. Savong	Production
Phat Long	Phat Long	Production
IRRAW LUALHATI	Irraw Lualhati	Production
FRANK CASSANO	Frank Cassano	PRODUCTION
NICK D. LUALHATI	Nick D. Lualhati	Production
Eric Hammel	Eric Hammel	Production
David Kerins	David W. Kerins	Production
Bill Seiple	William Seiple	Production
Blair McIntire	Blair McIntire	Production
Judy Wint	Judy Wint	Production
Sue Donovan	Sue Donovan	Technology

Attachment #7

Technology		Production - 1st shift	
Adam Selisker		Russ Lyons	
Melodee Nemeth	✓	Doug Arch	✓
Michelle Rudnick		John Back	✓
Sue Donovan	✓	Bill Hack	✓
Steve Katz		Greg Heydet	
Suzanne Zefferi	✓	Rose Walton	✓
Maryann Scudder	✓	Tim Arwood	✓
Christine Richie		Carmen Lebron	✓
Peggy Harrington		David Smith	✓
		Ken Hahn	✓
		Bob Beck	✓
Purchasing		Tom Golebiewski	✓
Kurt Schwartz		Bob Larew	✓
Linda Freed		Bill Windish	✓
Judy Winton	✓	Kevin Murray	✓
Ken Graupner		Ed Mills	✓
Angela Horan		Randy Shriver	✓
		Pete Whiting	✓
Lab		Steve Forbes	✓
Dave Williams	✓	Eric Williams	✓
Frank Keller	✓	Judy Thomason	✓
Andy Drobek	✓	Don MacMillan	✓
John Fisher	✓	Noneng Shriver	✓
Mike DiFerdinand	✓		
Lou Orawsky			
Wilda Ernst	✓		
Fred Signorino	✓		
		Maintenance	
		Joe Windish	✓
		Bill Howard (1st)	✓
Mixing		Jevan (Steve) Washington (1st)	✓
Michael Hannan	✓	Don Bizon (2nd)	
Joe Faust	✓	Tom Friedeborn (2nd)	
Joe Garish (2nd)	✓		
Dale Taylor	✓		
Ed Farley (2nd)	✓		
Michael Flash	✓		
		Ivyland	
		Charlie Straub	
		Brian Steinke	
Production - 2nd shift		Bill Rice	
Brien Meinhart	✓	Mike Taylor	
Wes Bower	✓	Rick Kresge	
Savong Uy	✓	Juan Matos	
Frank Cassano	✓	Bob Mogg	
Henry Lualhati	✓	Don Monaco	
JR Lualhati	✓	Jose Nieves	
Nick Lualhati	✓	Brian O'Donnell	
Phat Long	✓	Jim Lafferty	
David Kerins	✓	Mike Tomczynski	
Bill Seiple	✓	Pat Lewis	
Darren Powell	✓	Julian Felder	
Eric Hammel	✓	Thomas Steinly	
Ken Bachan		Larry Korin	
Edna Pomeroy	✓	Ed Greipp	
		Carol Grossman	
		Daniel Boucher	
		Kevin Shriver	
		Jeanette Shane	

***Required Fields**



Time Start 9:40 AM

Time Finish 11:00 AM

Inspection ID:
1601677

HAZARDOUS WASTE INSPECTION REPORT
☒ **GENERATOR** ☐ **S Q GENERATOR**

RCRA

Company name CRC Industries, Inc.

EPA I.D. Number PAD069880029

Employer I.D. Number (EIN) _____

Site Address 885 Louis Drive

County Bucks

Municipality Warminster Twp.

Zip 18974

Name of Inspector Eric Wiediger

Name & Title of Responsible Official Michelle Rudnick, Env. Health & Safety Mngr

Person Interviewed Michelle Rudnick

Telephone (215) 442-6224

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: 42000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Hazmat Environmental Group License Number NYD980769947

Transporter Name Clean Venture Inc. License Number NJ0000027193

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001, F002,	waste flammable liquids	Safety-Kleen Systems, Inc.
F003, F005,	waste solids (containing xylene, toluene)	1200 Sylvan St
D010, D039		Linden, NJ 07036
D001	waste flammable aerosols	Cycle Chem, Inc.
		550 Industrial Dr
		Lewisberry, PA 17339



.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CRC Industries, Inc. ID Number PAD069880029 Date 02/21/07

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

				REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
1	2	3	4				
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name CRC Industries, Inc. ID Number PAD069880029 Date 02/21/07

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection: 02/21/2007 Id No PAD069880029
Company/Facility/Site: CRC Industries, Inc.

A routine Large Quantity Generator of Hazardous Waste inspection was conducted by Eric Wiediger, inspector for the PA Department of Environmental Protection, Seth DiLorenzo and Jon Bower in attendance. CRC Industries, Inc. ("CRC") is a consumer chemical products manufacturer, located at 885 Louis Drive, in Warminster Township, Bucks County. Michelle Rudnick, Environmental Health and Safety Manager, granted access and provided a site tour. The following observations were noted:

1. A site tour was conducted. CRC generates hazardous waste in the form of waste flammable liquids during flushing operations, as well as waste rags and lab packs. Emergency stations, communication, and security appeared in-place and operational.
2. The lab's satellite accumulation area was inspected. The liquid and rag containers appeared properly labeled.
3. The product and waste storage warehouses were inspected. The main waste storage area is a four-level rack with waste drums organized on pallets. All drums appeared labeled and dated. The hazardous liquid waste drums were in the rack section and the hazardous solid waste rags were on a pallet on the floor. The waste storage area has a second containment lip. The facility's flooring is also sealed.
4. The production lines were inspected. One line was not running at the time of the inspection. Each line has a satellite accumulation area located on spill containment pads. The waste drums appeared properly labeled. No open containers were observed.
5. The mixing tank rooms were inspected. A satellite accumulation drum is connected to the process for flushing. The drum was labeled. No spills or leakage was observed.
6. A records review was conducted. The PPC Plan, manifests, biennial report for 2005, inspection logbook, and training logs were reviewed. All records appeared complete and well-organized. Waste flammable liquids are transported off-site about every month and disposed of at Safety-Kleen's Linden, NJ facility.

NO VIOLATIONS NOTED AS A RESULT OF THIS INSPECTION.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Michelle Rudnick Date 2/21/2007

Inspector (signature) Eric Wiediger Date 02/21/07



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Entity: 5183
Insp: 1300044

Inspection Date 12/22/03

Time Start 10:00

Time Finish 2:00

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name CRC Industries, Inc. I.D. Number PAD069880029

Site Address 885 Louis Drive

County Bucks Municipality Warminster Township Zip 18974

Name of Inspector Jon Bower

Name & Title of Responsible Official Michelle Milburn Enviro. & Safety Coordinator

Person Interviewed " " Telephone (215) 442-6224

Mailing Address (if different from above)

Amount of Hazardous Waste Generated per Month: ~30,000 Pounds Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad OtherPBR: ☐ Neutralization/WWTP ☐ Reclaim OtherGENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types

3. Hazardous Waste Transporters:

Transporter Name Tri-State Motor Transit Co. License Number PA-AH 0346

Transporter Name Safety Kleen License Number PA-AH 0172

Transporter Name License Number

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001/D027	Waste Flammable Liquids	Rineco
D035/D039	Waste Solids Containing Flammable	Benton, AR
D040/F002	Liquid	ARD981057870
		now using
		Safety Kleen
		NTD002182897

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CRC Industries, Inc. ID Number PAD069880029 Date 12/22/03

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CRC Industries, Inc. ID Number PAD069880029 Date 12/22/03

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 12/22/03 Identification Number PAD069880029Company/Facility/Site Name CRC Industries

An inspection was conducted by Jon Bower, Darrell Bigelow, Aleta Finney and Andrew Sinclair. Michelle Milburn was the facility guide.

A site walk was conducted. The facility has three satellite areas, a storage area in both Fall Lines and a bulk haz waste storage area which was recently constructed. The containers throughout the facility were properly labeled and closed. No spills were observed. The facility's waste streams are primarily a result of line flushing.

A record review was conducted. A new PPC plan has been developed and appears to be sufficient. The manifests were filled out properly. The Biennial report and training records were also available and complete. The source reduction strategy was available and was last updated in 2000. No violations were cited.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Michelle MilburnDate 12/22/2003Inspector (signature) Jon Bower

EVALUATION - VIOLATION - ENFORCEMENT FORM

07/97 VERSION

Handler ID Number:

RCRA Non-Notified YES [] NO [X]

If YES, the handler section must be completed.

Handler Name: CRC Industries

Street: 885 Louis Drive

City: Phila

State: PA

Zip Code: 19974

County or County Code: Phila

Contact: Michelle Milburn

UNIVERSE CHANGE REQUIRED: YES [] NO [X] or Indicates Universe Status of the RCRA Non-Notified

I. Indicate the facility's current Universe(s):

II. Indicate the new RCRIS Generator Universe:
LQG [] SQG [] CEG []

NON-HANDLER [] CLOSED []

NOTE: All TSD activities changes must be handled by the state data coordinator and cannot be made using this form.

III. Indicate the new transporter status:

Transporter []

You must check at least one of the boxes

Mark Mode of Transportation

[] Air [] Water
[] Rail [] Other
[] Highway

Non-Transporter []

Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste.

EVALUATION: Add [X] Change [] Delete []

Date: 1/22/2003 Number: [] Agency: S Type: CEF Reason: [] Branch: [] Person: P.A.J.E.B.

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

GGR [E]	GSC [E]	TWD []	DGW []	DOR []	DWP []	BRR []	FEA []
GLB [E]	GSQ []	DCH []	DLB []	DPB []	DIN []	BPS []	CSS []
GMR [E]	GEX []	DCL []	DLF []	DPP []	DIA []	BIS []	UOR []
GOR [E]	TGR []	DCP []	DLT []	DSI []	DPS []	BCE []	SCC [E]
GPT [E]	TMR []	DFR []	DMC []	DTR []	DOP []	BDT []	[]
GRR [E]	TOR []	DGS []	DMR []	DTT []	DMI []	CAS []	[]

Comments:

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION:

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined
[]	[]	[]	[]	[]	[]	[]	[]
[]	[]	[]	[]	[]	[]	[]	[]
[]	[]	[]	[]	[]	[]	[]	[]
[]	[]	[]	[]	[]	[]	[]	[]
[]	[]	[]	[]	[]	[]	[]	[]

VIOLATION: Add [] Change [] Delete [] Link to Above Evaluation: []

Agency	Number	Area	Class	Regulation Type	Regulation Citation	Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Returned to Compliance Actual
[]	[]	[]	[]	[]	[]	[]	[]	[]	[]	[]	[]

Comments:

☐ Required ☐ Required if pertinent ☐ Required only for previously reported data ☐ Not Required by EPA



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 11/19/2002

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name CRC Industries, Inc. I.D. Number PAD069880029Site Address 885 Louis DriveCounty Bucks Municipality Warminster Township Zip 18974Name of Inspector Michelle MilburnName & Title of Responsible Official Adam Selisker, Env. Health and Safety Manager V.P. TechnologyPerson Interviewed Adam Selisker Telephone (215) 442-6223Mailing Address (if different from above) sameAmount of Hazardous Waste Generated per Month: ~30,000 Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Tri-State Motor Transit Co. License Number _____

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001/D027/	Waste Flammable Liquids &	RINECO
D035/D039/	Waste Solids Containing	Benton, AR
D040/F002	Flammable Liquid	ARD981057870

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CRC Industries, Inc. ID Number PAD069880029 Date 11/19/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CRC Industries, Inc. ID Number PAD069880029 Date 11/19/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11/19/2002 Identification Number PAD069880029Company/Facility/Site Name CRC Industries, Inc.

A large quantity hazardous waste generator inspection was conducted by Michelle Milburn, Waste Management Specialist, with the PADEP. Present for the facility was Adam Selisker.

Satellite accumulation containers in the labs were inspected. One of the containers is permanently labeled. The other two containers are stored in a hood and labels often become unreadable. Mr. Selisker stated that he will attempt to place a label outside the hood. All hazardous wastes are stored in drums for disposal off-site. All drums were labeled, but a few were not dated. All drums were dated during the inspection. Most drums are stored on containment pallets, however, the facility presently has more drums than pallets. A few drums are on a wooden pallet. The facility is planning to schedule a pick-up very soon. The facility is reminded that all hazardous waste containers should be on containment at all times. The containers had previously been stored outside, but they are now inside. All drums are accessible via a narrow hallway. It is recommended that the drums be stored in a way such that all drums are easily accessible and all labels

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date 11/19/2002Inspector (signature) Michelle Milburn

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11/19/2002 Identification Number PAD069880029Company/Facility/Site Name CRC Industries, Inc.

are visible. Container inspections are conducted daily; records
were available for review.

Manifests for the past several months were reviewed and
appeared to be in order. The PPC Plan and Source Reduction
Strategy have not changed since the last inspection. The 2001
Biennial Report and the current training records could not be
located during the inspection.

One Violation is Being Cited:

Line H033- Not all hazardous waste containers are stored on
containment pallets. These containers do not have any other
form of secondary containment. - 25 PA Code Chap. 265a.179.

A follow-up inspection will be conducted.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date 11/19/2002Inspector (signature) Michelle Millburn



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENTInspection Date 7/25/2001

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name CRC Industries I.D. Number PADA09880029Site Address 885 Lewis Dr., WarminsterCounty Bucks Municipality Warminster Zip 18974Name of Inspector Michelle MilburnName & Title of Responsible Official Adam SeleskerPerson Interviewed Adam Selesker Telephone () _____Mailing Address (if different from above) same

Amount of Hazardous Waste Generated per Month: _____ Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CRC Industries ID Number _____ Date 7/25/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

				REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
1	2	3	4				
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
				Identification Number	262a.10	262.12	H002
				Authorized transporters only	262a.10	262.12(c)	H003
				Subsequent notification requirements met	262a.12(b)		H004
				Proper manifest used	262a.10	262.21	H005
				Manifests filled out correctly and completely	262a.20		H006
				Manifests signed and routed properly	262a.23(a)	262.23	H007
				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
				Specified records retained for three years	262a.10	262.40(c)	H014
				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
				Exception reporting procedures followed	262a.42	262.42	H016
				Spill reporting procedures followed	262a.10	262.34(d)	H017
				PPC plan developed and implemented	262a.10	262.34(a)	H018
				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
				Source reduction strategy prepared and available (LQG only)	262a.100		H020
				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CRC Industries ID Number PAD069880029 Date 7/25/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
				Containers of hazardous waste in good condition	265a.1	265.171	H026
				Containers and stored waste compatible	265a.1	265.172	H027
				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
				Containers managed to prevent leaks	265a.1	265.173(b)	H029
				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
				Container storage areas inspected at least weekly	265a.1	265.174	H031
				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
				Proper containment and collection systems in place	265a.179		H033
				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 7/25/2001 Identification Number PAD069880029Company/Facility/Site Name CRC Industries

A complaint investigation was conducted by Michelle Milburn, Waste Management Specialist with the PADEP. CRC Industries is a large quantity generator of hazardous wastes. The complainant alleged that CRC Industries was disposing of chemical-soaked rags and aerosol cans in a dumpster and that fumes were emanating from the dumpster. Adam Selisker is the facility representative.

The facility uses two dumpsters for plant trash and cardboard. No hazardous wastes were observed in either container. Empty unused aerosol cans are sometimes disposed of with the plant trash. Waste rags are stored in drums and are kept covered.

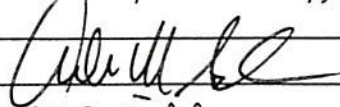
All hazardous wastes are properly stored.

No Violations Observed

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Date 07.25.2001Inspector (signature) Michelle Milburn

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART A

Date of Inspection 9/1/95 Time start 1:30pm Time finish 4:00pm
Name of Inspector Dennis HARNEY
Company, installation name CRC Industries, Inc.
Location 885 Louis Drive Warminster, PA 18974
County BUCKS Municipality Warminster TWP
Identification number PA0069880029
Name of responsible official Richard Miller / Adam Seliskar
Title V.P. - Research & Development / Env't and Safety Coordinator
Mailing Address 885 Louis Drive
Area code and telephone number (215) 674-4300
Name of person interviewed Adam Seliskar
Title Environmental and Safety Coordinator
Mailing address (if different from above) Same
Area code and telephone number (215) 442-6223

1. Site characterization: (Currently)
- | | | | | |
|---|---|-----------------------------------|---|--|
| a. <input type="checkbox"/> Treatment - | <input type="checkbox"/> surface impoundments | <input type="checkbox"/> chemical | <input type="checkbox"/> physical | <input type="checkbox"/> biological |
| b. <input type="checkbox"/> Storage - | <input type="checkbox"/> containers | <input type="checkbox"/> tanks | <input type="checkbox"/> surface impoundments | <input type="checkbox"/> waste piles |
| c. <input type="checkbox"/> Disposal - | <input type="checkbox"/> land treatment | <input type="checkbox"/> landfill | <input type="checkbox"/> incineration | <input type="checkbox"/> thermal treatment |
| d. <input type="checkbox"/> Use | <input type="checkbox"/> reuse | <input type="checkbox"/> recycle | <input type="checkbox"/> reclaim | |

2. Does the facility generate hazardous waste? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

F002
D001

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

No longer operating as a hazardous waste storage facility; only generation and accumulation of hazardous waste occurs at this site. Former hazardous waste accumulation tank has been removed entirely.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name CRC Industries Inc ID Number PA0069880029 Date 9/1/95

Hazardous Waste Inspection Report
TSD Facilities - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
X				Part A permit application submitted	265.1(b) 265.431(a)	H200
X				Identification number	265.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DER to transport hazardous waste	265.11(a)	H202
				Waste streams not covered by permit approved by DER before acceptance	265.13(a)	H203
				Chemical and physical analysis repeated as required	265.13(a)(1-3)	H204
				All waste shipments inspected and analyzed when necessary	265.13(b)	H205
				Waste analysis plan on-site	265.13(c)	H206
				24 hr. surveillance at active portion	265.14(b)(1)	H207
				Artificial barrier around active portion	265.14(b)(2)	H208
				Proper signs posted at each entrance, minimum 4 inch lettering	265.14(c)	H209
				Facility inspection schedule on-site	265.15(b)(1)	H210
				Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	265.15(d)	H211
				Immediate remedial action taken where a hazard is imminent or has already occurred	265.15(d)	H212
				Approved on the job or classroom personnel training program implemented	265.16	H213
				Records retained for each employee at facility of training, job title, and job description	265.16(f);(g)	H214
				Ignitable or reactive wastes separated from source of ignition or reaction	265.17(a)	H215
				No smoking signs displayed where there are hazards from ignitable or reactive wastes	265.17(a)	H216
				Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	265.17(b)	H217
				Facility maintained/operated to minimize possibility of fire, explosion, or discharge of hazardous waste or hazardous constituents	265.31	H218

**Hazardous Waste Inspection Report
TSD Facilities - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
	X			Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	265.32(1)	H219
				Device for summoning outside emergency assistance available at scene of operations	265.32(2)	H220
				Facility equipped with fire control, spill control, and decontamination equipment	265.32(3)	H221
				Facility equipped with water at adequate volume and pressure to supply fire control equipment	265.32(4)	H222
				Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained	265.33	H223
				Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	265.35	H224
				Contingency plan onsite and implemented	265.51(a)	H225
				Contingency plan describes action taken by personnel in the event of an emergency	265.52(a)	H226
				Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	265.52(c)	H227
				Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	265.52(d)	H228
				Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item	265.52(e)	H229
				Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	265.52(f)	H230
				Emergency coordinator designated and on the premises or on call	265.55	H231
				Facility accepting only PA manifests	265.71(a)	H232
				Manifest properly completed and routed within time limits	265.71(b)(c)	H233
				Manifest discrepancies resolved or reported within time limits	265.72(b)	H234
				Written operating record maintained on the premises	265.73(a).	H235
				Written operating record contains description and quantity of wastes and method of treatment, storage or disposal	265.73(b)(1)	H236
				Written operating record contains location and quantity of each hazardous waste	265.73(b)(2)	H237
				Written operating record contains results of waste analyses and treatability tests	265.73(b)(3)	H238
				Written operating record contains reports and details of all incidents	265.73(b)(4)	H239
				Written operating record contains records and results of all inspections	265.73(b)(5)	H240
	V			Written operating record contains required monitoring, testing, and analytical data	265.73(b)(6)	H241

Hazardous Waste Inspection Report

TSD Facilities - Part B

1-No Violation Observed

2-Not-Applicable

3-Not-Determined

4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
X				Written operating record contains closure and post-closure cost estimates	265.73(b)(7)	H242
	X			All records retained on premises and available for inspection	265.74(a)	H243
				Quarterly reports submitted to DER	265.75(a)	H244
				Emissions, discharges, fires, explosions, and groundwater contamination reported as required	265.77(a)	H245
				Groundwater monitoring wells located at approved sites	265.90(b)	H246
				Approved groundwater sampling and analysis plan developed and implemented	265.92(a)	H247
				Adequate protection for groundwater monitoring wells	265.92(d)	H248
				Groundwater quality assessment and abatement outline on the premises	265.93(a)	H249
				Closure plan on the premises and up-to-date	265.112(a)	H250
				Post-closure plan on the premises and up-to-date	265.118(a)	H251
				Annual closure cost estimate on the premises and up-to-date	265.142(a)	H252
	X			Annual post-closure cost estimate on the premises and up-to-date	265.144(a)	H253

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - STORAGE (TANKS) - PART B

Site Name CRC Industries Inc ID Number PAD0169 880029 Date 9/1/95

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
	X			Tanks labeled to accurately identify contents	265.194(d)
				Proper secondary containment provided	265.193
				Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	265.194(a)
				Tanks managed to prevent spills/overflows	265.194(b)
				Overfill prevention controls/devices provided	265.194(b)(2)
				Uncovered tanks operated to ensure sufficient freeboard	265.194(b)(3)
				Monitoring equipment data inspected once each operating day	265.195(a)
				Overfill/spill control equipment inspected daily	265.195(a)(1)
				Construction materials of tanks inspected daily	265.195(a)(4)
				Externally accessible portion of tank system inspected daily	265.195(a)(4)
				All hazardous waste removed from tanks and related appurtenances at closure	265.197
				Proper placement of ignitable or reactive waste	265.198(a)
				Tanks in which ignitable or reactive waste is treated or stored meets NFPA buffer zone requirements	265.198(b)
	V			Precautions taken for handling ignitable, reactive or incompatible waste or materials	265.199

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 9/1/95 Time start 1:30pm Time finish 4:00pm
Name of Inspector Dennis HARNEY
Company, installation name CRC Industries, Inc
Location 885 Lewis Drive
County Bucks Municipality Warminster TWP
Identification number PAD 069880029
Name of responsible official R. Miller / Adam Seliskar
Title VP R+D / Env'l + Safety Coordinator
Mailing Address 885 Lewis Drive Warminster, PA 18974
Area code and telephone number (215) 674-4200
Name of person interviewed Adam Seliskar
Title Environmental + Safety Coordinator
Mailing address (if different from above) - same -
Area code and telephone number _____

1. Current waste handling method:

- | | | | | | |
|----|--|-------------------------------------|-----------------------------------|--|----------------------------------|
| a. | <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. | <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. | <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. | <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. ~ 25,000 kg./mo.
b. ~ 336,000 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
EC02, DM1	Safety Klean Environmental Systems	Kinden, NJ

4. Source Reduction: ☒ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name CRC Industries Inc ID Number PA069880029 Date 9/1/95

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
	X			Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
	X			PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
X				Shipping containers marked and labeled according to U.S. DOT	262.30(2)	H010
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
X				h). Proper containment and collection system(s)	265.178	H023
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
X				Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
X				Special requirements followed for international shipments	262.50,.53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation
1	2	3	4			40 CFR Part 268
				Generators		
X				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
X				Dilution not used as a substitute for treatment.		3
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
	X			Storage Facilities		
				Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.		50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				Treatment Facilities, Including PBR and RRR Facilities		
				Dilution not used as a substitute for treatment.		3
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities		
				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
	X			Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
	X			Facility retains copies of generator notifications and certifications.		7(c)(1)

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Waste Management

Inspection Report Comments

Date of Inspection 9/1/95 Identification Number PAD069880029

Company/Facility/Site Name CRC Industries, Inc.

Unannounced hazardous waste generator and EPA List TSD facility inspections were conducted by Dennis Harney of PA DEP at the above-referenced facility. Adam Selisker, Environmental and Safety Coordinator of CRC, was present at the time of inspection. These inspections also serve to follow up on issues brought to light by the previous inspection.

TSD Status

Since the last inspection, the tank that was once used for hazardous waste accumulation has been removed. The permit application that was returned to CRC on September 4, 1986 was intended to allow storage of hazardous wastes in this recently removed tank. The inspector has no reason to believe that TSD activity contrary to applicable rules and regulations occurred at this site.

Attached are photocopies of the following documents regarding the removal of this tank: New Jersey Hazardous Waste Manifest #NJA1967295 for disposal of typical hazardous wastes generated by the facility as well as any tank cleaning wastes, Lab Analysis Reports from Wright Lab Services, Inc. for containment area and background soil sampling, Wright Lab Services Chain of Custody Record, AECC tank removal receipt, and a photocopy of photographs taken of the former location of the tank. A new raw materials storage tank has been placed in the location of the former hazardous waste tank. It is the inspector's recommendation that CRC be removed from EPA's TSD list.

Generator

Paperwork that was not reviewed during the last inspection was reviewed during this inspection. Source reduction, personnel training, PPC, and waste determination information was reviewed and determined to be complete.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Copy sent to Facility Date 9/22/95
Inspector (signature) Dennis B. Harney Date 9/22/95

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Waste Management

Inspection Report Comments

Date of Inspection 9/1/95 Identification Number PAD069880029

Company/Facility/Site Name CRC Industries, Inc.

Since the last inspection, containment pallets have been put into use for drums containing hazardous waste. All drums of hazardous waste are kept on these containment pallets, and outdoor pallets are covered with a heavy cover with elasticized edges that should effectively keep all precipitation out of the containment pallet. Facility inspections which include inspection of hazardous waste containers are and have been conducted and logged as required in the regulations. Mr. Selisker was unaware of these inspections taking place at the time of last year's inspection. All drums of hazardous waste observed at the facility were managed in accordance with the regulations.

Manifests were reviewed and determined to be filled out and routed properly. Facility reporting requirements are also being met.

No violations observed at the time of inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy sent to facility Date 9/22/95

Inspector (signature) Dennis P. Hanning Date 9/22/95



State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section
ON 421, Trenton, NJ 08625-0421

Form Approved OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		Manifest Number	Page 1 of 1	Information in the shaded areas is not required by Federal law.	
Generator's Name and Address CRC CHEMICALS 880 LOUIS DR. HARRISBURG, PA. 18974		State Manifest Document Number NJA 1967295		State Generator's ID (Gen. Site Address) SAME	
Transporter's Name Safety-Kleen Corp.		EPA ID Number TL0984908202		State Trans. ID-NJDEP 08690	
Facility Name and Site Address SAFETY KLEEN CORP. 100 SYLVAN ST. INDEN, NJ. 07036		EPA ID Number NJ0002182897		Decal No. 908-862-2000	
US DOT Description (including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group)		Containers	Total Quantity	Unit (A:Vol)	Waste No.
X RO WASTE FLAMMABLE LIQUIDS N.O.S. (1,1,1-TRICHLOROETHANE & TOLUENE) UN1993 PG II (F002) (ERG#27)		049 DM	02695	G	F002
Additional Descriptions for Materials Listed Above D001, F003, F005, D035 (L, I, T, E)		Hazarding Codes for Wastes Listed Above Blank			
Special Handling Instructions and Additional Information CNT # 15188-6 24 HOUR EMERGENCY RESPONSE # 708-888-4660 60-7902 PAAH-0172 24 Hr E&S # 1-708-888-4660 N.J. DRU # 62682-62694					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.		7723153			
Printed/Typed Name ADAM M. SELISKER		Signature <i>Adam M. Selisker</i>		Month Day Year 01/18/95	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year 01/18/95	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Unresponsive Based on Revised Scope Month Day Year 01/18/95			

Page # 1
Sample # 69313-1

ATTN: Mr. Adam Selisker
CRC Industries Inc.
885 Louis Drive
Warminster PA 18974

February 2, 1995

LAB ANALYSIS REPORT

Job Name	: CRC Industries Inc.	Customer PO#	:
Job Number	: C6134-AS-MC	Date Sampled	: 01/23/95 11:30 AM
Location	: Soil-Surface	Date Received	: 01/23/95
Sample State	: Soil	Date Completed	: 02/01/95
Collector	: GJW	Discard Date	: 02/09/95

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
FOX/TOC				
Total Organic Halogen	N.D.	mg/kg	100	9020M

N.D. - Not Detected

This report relates only to the samples as received by the laboratory, and may only be reproduced in full.

QUALITY ASSURANCE REPORT

Q/A PARAMETER	RESULT	
FOX/TOC		
Total Organic Halogen	102	% Recovery Spike

Respectfully Submitted,
WRIGHT LAB SERVICES

Unresponsive Based on Revised Scope
Unresponsive Based on Revised Scope
Unresponsive Based on Revised Scope
Unresponsive Based on Revised Scope

Laboratory Manager



34 Dogwood Lane • Middletown, PA 17057

(717) 944-5541 • FAX (717) 944-1430

Philadelphia • (215) 640-1323

Marvland • (410) 244-8889



Page # 1
Sample # 69313-2

ATTN: Mr. Adam Selisker
CRC Industries Inc.
885 Louis Drive
Warminster PA 18974

February 2, 1995

LAB ANALYSIS REPORT

Job Name	: CRC Industries Inc.	Customer PO#	:
Job Number	: C6134-AS-MC	Date Sampled	: 01/23/95 11:36 AM
Location	: Wipe-Pit	Date Received	: 01/23/95
Sample State	: Wipe	Date Completed	: 02/01/95
Collector	: GJW	Discard Date	: 02/09/95

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
TOX/TOC				
Total Organic Halogen	N.D.	mg/wipe	10	9020M

N.D. - Not Detected

This report relates only to the samples as received by the laboratory, and may only be reproduced in full.

Respectfully Submitted,

WRIGHT LAB SERVICES

Unresponsive Based on Revised Scope
Unresponsive Based on Revised Scope
Unresponsive Based on Revised Scope

Laboratory Manager



Wright Job Considered

CHAIN OF CUSTODY RECORD

DATE REQUESTED. 5/20/68

REPORT TO:		CONTACT		PHONE NO.		SALESMAN	
PROJECT NAME		PROJECT NO.		P.O.-NO.		DATE RECEIVED:	
1000 6. 21. 1974		1-23-95		6511		1000 6. 21. 1974	
BILL TO:		DATE SAMPLED		ANALYSES TO BE PERFORMED		REMARKS	
SAMPLE DESCRIPTION/LOCATION		TIME OF SAMPLING		TOTAL NO. OF CONTAINERS		REMARKS	
1 Col. Surface		1130		1		1000 6. 21. 1974	
2 Col. Surface		1130		1		1000 6. 21. 1974	
3						1000 6. 21. 1974	
4						1000 6. 21. 1974	
5						1000 6. 21. 1974	
6						1000 6. 21. 1974	
7						1000 6. 21. 1974	
8						1000 6. 21. 1974	
9						1000 6. 21. 1974	
10						1000 6. 21. 1974	
REMARKS:		SHIPPING CARRIER:		SHIPPING TICKET NUMBER:		CHAIN-OF-CUSTODY SEAL:	
						INTACT BROKEN ABSENT	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME		RECEIVED BY:	
RELINQUISHED BY:		DATE		TIME		RELINQUISHED BY:	
RECEIVED BY:		DATE		TIME			

I N V O I C E

AECC
 AMERICAN ENVIRONMENTAL
 CLEANUP CORP.
 3272 MANOR ROAD
 HUNTINGDON VALLEY, PA 19006

Date	Invoice
11/22/94	1202

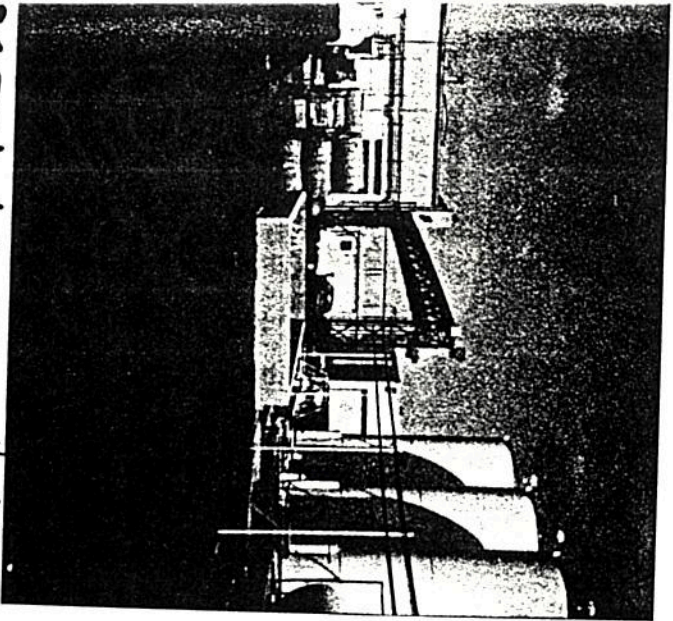
Bill CRC INDUSTRIES
 To: 885 LOUIS DRIVE
 WARMINSTER PA, 18974

*file
 PA
 Tank Closure*

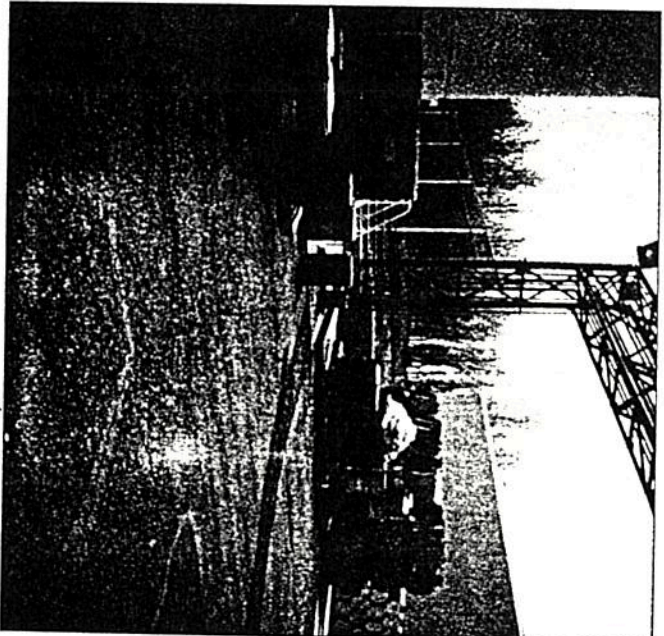
PO Number		Terms	Project
51348		UPON RECEIPT	TANK REMOVAL
Quantity	Description	Rate	Amount
1	TANK REMOVAL TANK REMOVAL-DEPOSIT RECEIVED	3,375.00 -500.00	3,375.00 -500.00
		TOTAL:	2,875.00

Original

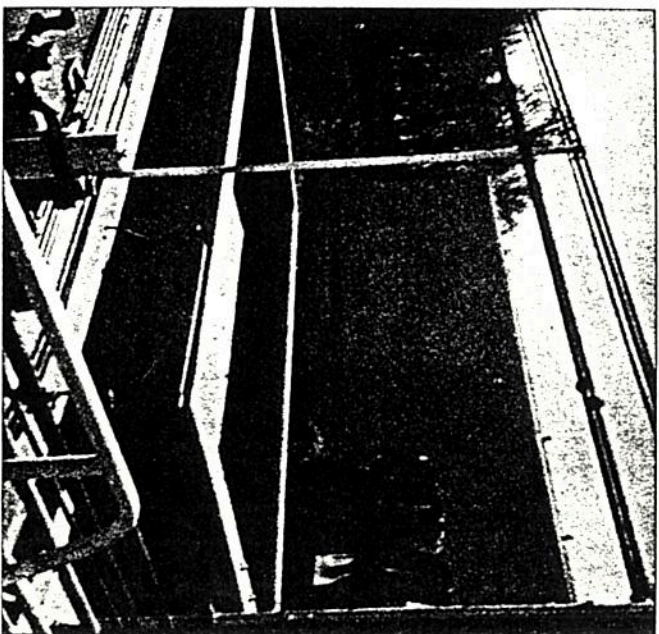
BALANCE DUE: 2,875.00



RC Industries Inc. 11/22/94
200 gal Waste Tank Removed



CRC Ind. Inc 11/22/94
5000 gal Waste Tank Removed



CRC Industries 11/22/94
5000 gal. Tank Removed
(WASTE TANK)



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 10/22/2001

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name CRC Industries, Inc. I.D. Number PAD069880029Site Address 885 Louis Dr.County Bucks Municipality Warminster Zip 18972Name of Inspector Michelle MilburnName & Title of Responsible Official Adam Selisker, Env. Health & Safety Mgr.Person Interviewed Adam Selisker Telephone (215) 442-6223Mailing Address (if different from above) SameAmount of Hazardous Waste Generated per Month: > 20,000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Tri-State Motor Transit Co. License Number _____Transporter Name Night hawk Transport License Number _____Transporter Name (MNR 000022947) License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001/D027/ D035/D039	Waste Flammable Liquid	RINECO Benton, AR ARID81037870
D001/F002/ F003	Waste Flammable Solid	
F003/F005	Perchloroethylene, Toluene	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CRC Industries ID Number PADO69380029 Date 10/22/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CRC Industries, Inc. ID Number PAD069880029 Date 10/22/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
	X			Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 10/22/2001 Identification Number PAD069 880029Company/Facility/Site Name CRC Industries, Inc

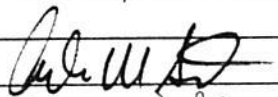
A large quantity hazardous waste generator inspection was conducted by Michelle Milburn, Waste Management Specialist, with the PADEP. Present for the facility was Adam Selisker.

A facility tour was conducted. Satellite accumulation areas were inspected. All drums were inspected, and were found to be properly labeled. The main drum storage area was inspected; all drums were labeled and dated. Some of the drums were contained on pallets, however, many were sitting on wood pallets that do not provide containment. The facility is reminded that all waste drums should have proper secondary containment. The facility has a repackaging/staging area for returned products. Some of these materials can be repackaged and sold; other materials become waste and must be disposed. The repackaging area presently contains a high volume of damaged and returned items. Some damaged items may start to leak or could rupture. The facility should make a clear determination as to which items will be waste. These items should be properly handled as soon as possible as either a hazardous or residual waste.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Date 10.22.2001Inspector (signature) Michelle Milburn

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 10/22/2001 Identification Number PAD069880029Company/Facility/Site Name CRC Industries, Inc.

Manifests for the past three months were reviewed. These manifests were fully and properly completed. Employee training records were available. Training was last conducted in April 2001. Inspection logs for the waste storage area were inspected. The PPC Plan and the Source Reduction Strategy have not changed since the last inspection. No biennial report was required since the last inspection. The next report will be due March of 2002.

No Violations Cited

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Date 10.22.2001Inspector (signature) Michelle Miller

